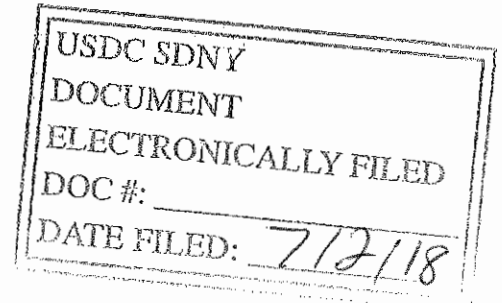




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June 29, 2018

VIA ECF

Honorable Paul Crotty
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 14C
New York, N.Y. 10007

7/2/2018

The time to respond to the
complaint is extended to July
25, 2018. SO ORDERED.

Re: *LVM v. Lloyd et al*, 18-cv-01453 (PAC)

Dear Judge Crotty:

As counsel for the plaintiffs in this action, which challenges the prolonged and unlawful detention of immigrant children by the Office of Refugee Resettlement, we write to update the Court following the rulings earlier this week on the government's motion to dismiss and the plaintiffs' motions for class certification and preliminary injunction. The plaintiffs intend to recommence discovery immediately in anticipation of further proceedings in this matter and with the goal of completing discovery and being ready for any evidentiary proceeding as soon as possible. We are in contact with the government and seek to negotiate a proposed schedule for discovery that is mutually acceptable to the parties. We plan to inform the Court no later than the week of July 9 regarding whether the parties have reached an agreement, or if we will seek the Court's intervention on this issue.

In addition, under Federal Rule of Civil Procedure 12(a)(4)(A), the government's deadline to respond to the complaint is July 11, 2018. The government requests an additional 14 days, until July 25, 2018, to respond to the plaintiffs' complaint, and the plaintiffs consent to this request. ✓

Thank you for your consideration of these matters.